

C L I F F O R D
C H A N C E

CLIFFORD CHANCE US LLP

2001 K STREET NW
WASHINGTON, DC 20006 - 1001
TEL +1 202 912 5000
FAX +1 202 912 6000
www.cliffordchance.com

By ECF

Direct Dial: +1 202 912 5031

E-mail: Roni.Bergoffen@cliffordchance.com

Hon. Frank Maas
United States Magistrate Judge
Southern District of New York
Daniel P. Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312

June 30, 2015

Re: In re Terrorist Attacks on September 11, 2001, 03 MDL 1570 (GBD/FM)

Dear Judge Maas:

The Defendants' Executive Committee, on behalf of the Defendants who are currently before this Court in merits discovery, respectfully requests a 45 day extension of the current July 30, 2015 deadline for Plaintiffs and all Defendants engaged in merits discovery to submit amended Initial Disclosures pursuant to Rule 26(a)(1) (Dkt. # 2957), in light of current and ongoing religious holidays including Ramadan and Eid, which take place from June 17 to July 18, 2015.

Defendants' Executive Committee has met and conferred with the Plaintiffs' Executive Committees on this matter, and Plaintiffs have consented to the requested extension.

We respectfully request a revised deadline for Plaintiffs and all Defendants engaged in merits discovery to provide supplemental witness list information by September 15, 2015.

Sincerely,



Roni Bergoffen

cc: Hon. George B. Daniels
Counsel of Record (by ECF)